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MORTON & CRAIG, LLC
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Attorney for Hyundai Lease Titling Trust
JM5630_____

IN RE:
RICHARD RALPH CIARELLI
LINDA CIARELLI

UNITED STATES
BANKRUPTCY COURT FOR
THE DISTRICT OF NEW
JERSEY

CHAPTER 13
CASE NO: 16-27101(CMG)
HEARING DATE: 11-19-2018

NOTICE OF MOTION OF
HYUNDAI LEASE TITLING
TRUST TO MODIFY THE
AUTOMATIC STAY AND
CO-DEBTOR STAY

To:
Richard and Linda Ciarelli
20 Buckingham Drive
Ocean, NJ 07712
Debtor

Douglas Ciarelli
20 Buckingham Drive
Ocean, NJ 07712
Non-bankrupt co-debtor

Eugene D. Roth, Esq.
Valley Pk. East
2520 Hwy 35, Suite 307
Manasquan, NJ 08736
Attorney for the debtor

CONTINUED

Albert Russo
Standing Chapter 13 Trustee
CN 4853
Trenton, NJ 08650-4853
Trustee

John R. Morton, Jr., Esquire, attorney for Hyundai Lease Titling Trust, has filed papers with the Court for relief from the automatic stay and co-debtor stay as to the non-bankrupt co-debtor, **Douglas Ciarelli**, to permit Hyundai Lease Titling Trust to repossess and sell the motor vehicle(s) described in the attached pleadings. Your rights may be affected. **You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult with one.** If you do not want the Court to grant the relief sought, or if you want the Court to consider your views on the motion, then no later than seven (7) days before the hearing date, you or your attorney must:

File with the Court a written request for a hearing (or, if the Court requires a written response, an answer, explaining your position) at:

United States Bankruptcy Court
402 E. State Street
Trenton, NJ 08608

If you mail your (request) (response) to the Court for filing, you must mail it early enough so the Court will receive it on or before the date stated above.

You must also mail a copy to:

John R. Morton, Jr., Esquire
110 Marter Avenue, Suite 301
Moorestown, NJ 08057

Attend the hearing scheduled to be held on November 19, 2018 at 9 a.m. in Courtroom #3, United States Bankruptcy Court, 402 E. State Street, Trenton, New Jersey, 08608.

TAKE FURTHER NOTICE that the facts movant relies upon, as set forth on the accompanying certification, and the basis for relief from the automatic stay, do not present complicated questions of fact or unique questions of law, it is hereby submitted that no brief is necessary in the Court's consideration of the within Motion, and TAKE FURTHER NOTICE that oral argument is hereby not requested.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

Date: 10-25-2018

/s/ John R. Morton, Jr. Esquire
John R. Morton, Jr., Esquire
Attorney for Hyundai Lease Titling Trust